

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

_____	)	
JEOFFREY L. BURTCH, CHAPTER 7	)	
TRUSTEE, FACTORY 2-U STORES,	)	
INC., et al.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:07-cv-00556-JJF-LPS
	)	
MILBERG FACTORS, INC.,	)	
CAPITAL FACTORS, INC., THE CIT	)	
GROUP/COMMERCIAL SERVICES, INC.,	)	
GMAC COMMERCIAL FINANCE LLC,	)	
HSBC BUSINESS CREDIT (USA) INC.,	)	
ROSENTHAL AND ROSENTHAL, INC.,	)	
STERLING FACTORS CORPORATION,	)	
WELL FARGO CENTURY, INC.,	)	
	)	
Defendants.	)	
_____	)	

**APPLICATION FOR ORAL ARGUMENT OF GMAC COMMERCIAL  
FINANCE LLC, STERLING FACTORS CORPORATION  
AND WELLS FARGO CENTURY, INC.**

Pursuant to D. Del. LR 7.1.4, Defendants GMAC Commercial Finance LLC (“GMAC CF”), Sterling Factors Corporation (“Sterling”) and Wells Fargo Century, Inc. (“Wells Fargo Century”), by and through the undersigned counsel, hereby request oral argument on their Motion to Dismiss the Complaint (D.I. 29). Briefing on the Motion was completed on April 2, 2008. GMAC CF, Sterling and Wells Fargo Century’s opening brief was filed as Docket Item No. 31, plaintiff’s opposition brief was filed as Docket Item No. 50, and GMAC CF, Sterling and Wells Fargo Century’s reply brief was filed as Docket Item No. 52.

Respectfully submitted,

EDWARDS ANGELL PALMER &  
DODGE LLP  
Wilmington, Delaware

By: /s/ Denise S. Kraft  
Stuart M. Brown (No. 4050)  
Denise Seastone Kraft (No. 2778)  
Mark D. Olivere (No. 4291)

919 N. Market Street, Suite 1500  
Wilmington, DE 19801  
(302) 777-7770  
smbrown@eapdlaw.com

and

OTTERBOURG, STEINDLER  
HOUSTON & ROSEN, P.C.

Daniel Wallen  
Bernard Beitel  
Lloyd M. Green

230 Park Avenue  
New York, New York 10169  
(212) 661-9100

Counsel for Defendants GMAC Commercial Finance LLC,  
Sterling Factors Corporation, and Wells Fargo Century, Inc.

Dated: April 3, 2008

**CERTIFICATE OF SERVICE**

I, Denise Seastone Kraft, hereby certify that on April 3, 2008, the Application For Oral Argument of GMAC Commercial Finance LLC, Sterling Factors Corporation and Wells Fargo Century, Inc. was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to counsel of record and the document is available for viewing and downloading from CM/ECF.

/s/ Denise Seastone Kraft  
Denise Seastone Kraft (No. 2778)